

Message

From: Garrison, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F3BA15187A464688A839A843B7B59CA0-SGARRISO]
Sent: 6/27/2019 2:45:07 PM
To: Yarger, Ryne [Yarger.Ryne@epa.gov]; Kasai, Jeanne [Kasai.Jeanne@epa.gov]
CC: Lloyd, Matthew [Lloyd.Matthew@epa.gov]
Subject: RE: Scott - Questions on federal agency plans

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Thanks for the reminder, I'd circulated a draft for comment here and forgot about it. I'll get it to you right away.

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From: Yarger, Ryne
Sent: Thursday, June 27, 2019 9:55 AM
To: Kasai, Jeanne <Kasai.Jeanne@epa.gov>; Garrison, Scott <Garrison.Scott@epa.gov>
Cc: Lloyd, Matthew <Lloyd.Matthew@epa.gov>
Subject: RE: Scott - Questions on federal agency plans

Hi Scott,

I just wanted to follow up quickly to see if you've had a chance to look at these. I haven't seen anything, and since Jeanne's out until the 8th, I thought I'd double check in case your responses were only sent to her email.

Thanks,
Ryne Yarger
Certification and Worker Protection Branch
Field and External Affairs Division
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
703-605-1193

From: Kasai, Jeanne
Sent: Wednesday, June 12, 2019 6:05 PM
To: Garrison, Scott <Garrison.Scott@epa.gov>
Cc: Yarger, Ryne <Yarger.Ryne@epa.gov>
Subject: Scott - Questions on federal agency plans

Hi Scott -

I received the following questions from federal agencies. I tried to form a response to them, but couldn't do so with the first one.

1. EPA is deliberating FIFRA 24(c) state-specific labelling of pesticides, specifically more-restrictive labelling vs. additional uses [see, for example: <https://www.dtnpf.com/agriculture/web/ag/crops/article/2018/11/01/state-restrictions-federal-pesticide>]. How does EPA intend to apply label requirements to multi-state applications of 24(c) products by Federal agency employees, who are certified by their agency, on Federal lands?

Ex. 5 Deliberative Process (DP)

2. In States that certify “commercial” applicators of “general use” and “restricted use” pesticide, will a Federal agency certification for RUP suffice for applications of both “general use” and “restricted use” pesticide?

Ex. 5 Deliberative Process (DP)

3. If Federal employee is certified by his/her agency for a period of 4 years, but neighboring State uses 2-year certification periods, will Federal employee need to be recertified more frequently than each 4 years?

Ex. 5 Deliberative Process (DP)

4. Does EPA consider any State/Tribal “licensing” requirements for pesticide applicators to be “substantive” standards in regard to qualifications for commercial applicator certification that exceed the USDA/FS certification plan standards?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

5. USDA has certified applicators applying RUPs in States X and Y. States X and Y have a reciprocal agreement. If USDA certifies an applicator based on State X's certification, is the USDA employee certification valid in States X and Y?

Ex. 5 Deliberative Process (DP)

Thanks for your review, edits and comments!

Jeanne Kasai, USEPA

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